

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION**

**UNITED STATES OF AMERICA**  
**Plaintiff,**

**v.**

**EDELIEL ESANULSANCHAZE**  
**RAINEY**  
**Defendant.**

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**NO. 2:24cr83**

**MOTION FOR CONTINUANCE**

NOW COMES Antoinette N. Harris, counsel of record in the above-captioned matter, and respectfully moves this Honorable Court for a continuance of the hearing currently set for June 6, 2025, on the Motion to Withdraw as Counsel. In support of this Motion, counsel states the following:

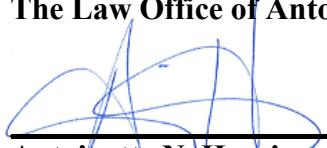
1. The Court initially set the hearing on the Motion to Withdraw for June 3, 2025. A subsequent notice reset the hearing to June 6, 2025.
2. Counsel was not consulted regarding availability before the issuance of the original or amended setting. Counsel has a longstanding, pre-scheduled professional obligation on June 6, 2025, that cannot be rescheduled despite reasonable efforts.
3. Additionally, counsel is scheduled to be in trial next week and anticipates that the trial will last through Thursday, June 5, 2025, making participation in a June 6 hearing unfeasible.
4. Counsel respectfully proposes June 13, 2025, or June 20, 2025, as alternative dates on which she is available to appear in person. Counsel is also available to attend a virtual hearing, if the Court is amenable, though she recognizes that such accommodations may not align with the Court's usual practice.

5. On June 1, 2025, counsel placed two phone calls to chambers in an effort to notify the Court of this scheduling conflict and to request an opportunity to be heard regarding alternative dates.
6. Counsel's presence is necessary to address matters relevant to the Motion to Withdraw and to ensure an orderly transition in representation, should the Court grant the motion.
7. This request is made not for purposes of delay but in the interest of justice and to allow the Court to hear from all necessary parties.

WHEREFORE, PREMISES CONSIDERED, counsel respectfully requests that the Court grant this Motion for Continuance and reset the hearing on the Motion to Withdraw to a date on which counsel is available.

Respectfully submitted,

**The Law Office of Antoinette N. Harris, PLLC**



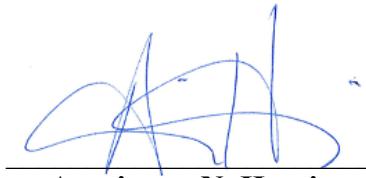
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*Attorney for Edielie Espanulsanchaze Rainey*

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 47.1(b), I, Antoinette N. Harris, certify that on June 2, 2025, I conferred via email with AUSA Jeff Haag and AUSA Anna Bell regarding the Motion for Continuance. The Government takes no position the filing of the aforementioned Motion.



Antoinette N. Harris

**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2025, a true and correct copy of the foregoing was served via electronic mail and CM/ECF to:

**Jeff Haag**  
Assistant United States Attorney  
West Texas Branch Chief  
Northern District of Texas, Amarillo Division  
500 South Taylor Street, Suite 300  
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Antoinette N. Harris

